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U.S. District Court
Eastern District of MO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
____________ DIVISION

JL Windham)
)
____________________)
)
____________________)
(Enter above the full name of the Plaintiff[s])
in this action.))
)
)
- vs -)
Shonna Junean Harden) Case No. ____________
) (To be assigned by Clerk of District Court)
____________________)
)
____________________)
)
____________________)
)
____________________)
(Enter above the full name of **ALL** Defendant[s] in this action. Fed. R. Civ. P. 10(a) requires that the caption of the complaint include the names of **all** the parties. Merely listing one party and "et al." is insufficient. Please attach additional sheets if necessary.)

COMPLAINT

I. State the grounds for filing this case is Federal Court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

I am filing this case as a defamation per se (Defamation of Character) against Ms. Shonna Harden, Based upon the Libel and Slander Statutes under Missouri Defamation Law Section 509.210.1,

II. Plaintiff, Jermaine Windham resides at

12705 Pine Acres Ave, Pineville, Mecklenburg

street address city county

NC, 28134, ________.

state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

III. Defendant, Shonna J. Harden lives at, or its business is located at

10110 Chaucer Ave. Overland, St. Louis,

street address city county

MO., 63114.

state zip code

work address
11125 South Dunn Rd
211 North
St. Louis, MO 63136

(if more than one defendant, provide the same information for each defendant below)

IV. Statement of claim (State as briefly as possible the facts of your case. Describe how each defendant is involved. You must state exactly what each defendant personally did, or failed to do, which resulted in harm to you. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary):

Ms. Harden is a former associate and care provider. Ms. Harden was aware of my status as a disabled person (disabled veteran), as well as my social status as a pastor and church leader. Between 04/2016-present she has continued to slander my personal image, and to falsely make condemning accusations against myself and family.

Ms. Harden has furthered her cause by filing an order of protection against me on 07/18/2016. She was given the order under false pretenses on 10/25/2016. I have filed an appeal in this matter, based upon the violation of my due process, of which I was never served the document which was falsely reported as served 10/2/16. Ms. Harden has used this false documentation, as slander against me, by reporting this to officials of The Christian Northeast Hospital, where I have doctors located that have treated me as a Cancer patient, and I once was employed as a chaplin. I have filed a complaint with HIPPA of the violations that have occurred. Ms. Harden has also Interferred with my business dealing as well as taken money from me as a loan, of which she never repaid.

V. Relief: State briefly and exactly what you want the Court to do for you.

My wish is for this court to hold Ms. Harden accountable for libel and slander, and the emotional distress which she has caused. To also restore any and all financial losses accumulated.

VI. **MONEY DAMAGES:**

A) Do you claim either actual or punitive monetary damages for the acts alleged in this complaint?

YES [X] **NO** [ ]

B) If your answer to "A" is YES, state below the amount claimed and the reason or reasons you believe you are entitled to recover such money damages:

I am seeking recovery of financial losses due to loans $2,500, and loss of income potential $2,500 for a total of $5,000.00

VII. Do you maintain that the wrongs alleged in the complaint are continuing to occur at the present time?

YES [X] **NO** [ ]

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 24 day of April, 2017

Signature of Plaintiff(s)